

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
AT AKRON**

<b>DRIPS HOLDINGS, LLC,</b>	)	
	)	
	)	
<b>Petitioner,</b>	)	<b>Case No: 5:21-mc-00017-PAB</b>
	)	
<b>v.</b>	)	<b>Judge Pamela A. Barker</b>
	)	
<b>QUOTEWIZARD.COM LLC,</b>	)	<b>Arising from <i>Joseph Mantha v. QuoteWizard.com, LLC</i>, No. 1:19-cv-12235-LTS (D. Mass.)</b>
	)	
<b>Respondent.</b>	)	
	)	

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**RESPONDENT'S MOTION TO STAY ITS RESPONSE DEADLINE TO PETITIONER'S  
MOTION TO QUASH PENDING FORTHCOMING RULINGS THAT WILL AFFECT  
OR GOVERN THIS DISPUTE**

Now Comes Respondent QuoteWizard.com LLC (“QuoteWizard”) and respectfully moves this Court to stay its response deadline to Petitioner Drips Holdings, LLC’s (“Drips”) Motion to Quash [ECF No. 1], which is currently March 29, 2021, pending forthcoming rulings that will impact, or govern this dispute at least in part, and will therefore affect QuoteWizard’s response, namely: (1) an expected forthcoming ruling in the underlying case in the District of Massachusetts<sup>1</sup> concerning the burden to Drips in producing the records at issue under the subpoena that is the subject of the motion to quash, and (2) a ruling from this Court on the pending motion to intervene and transfer.<sup>2</sup> If the Court grants QuoteWizard’s request for a stay, QuoteWizard will promptly

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<sup>1</sup> *Joseph Mantha v. QuoteWizard.com, LLC*, Case No. 1:19-cv-12235-LTS (D. Mass.). By Order dated March 16, 2021, a copy of which was filed with this Court (see ECF No. 8, Ex. 1), the Honorable Leo T. Sorokin requested that the parties therein file supplemental briefing on the issue of the burden to Drips in producing the records at issue under the subpoena. A ruling on the same is expected soon.

<sup>2</sup> Plaintiff Joseph Mantha has filed a motion to intervene in this action and transfer the same to the United State District Court for the District of Massachusetts (see ECF No. 9), where the underlying case is pending.

notify this Court when the forthcoming ruling is issued from the District of Massachusetts and will file a copy of the same herein.

In the alternative, QuoteWizard requests a ten-day extension of its March 29, 2021 response deadline, or to and including April 8, 2021. Drips's counsel has assented to the alternative requested relief of a ten-day extension, but does not assent to QuoteWizard's request to stay its response deadline pending the forthcoming rulings.

In further support of this Motion, QuoteWizard files herewith its memorandum of law.

WHEREFORE, QuoteWizard respectfully requests that the Court grant this motion and stay QuoteWizard's response deadline to Drips's Motion to Quash, which is currently March 29, 2021, until the issuance of the aforementioned, forthcoming rulings, or in the alternative extend its response deadline by ten days, to and including April 8, 2021.

Respectfully submitted,

*/s/ Melissa Foster Bird*

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on March 29, 2021, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all attorneys of record registered with the Court's CM/ECF system as follows, and has e-mailed a copy of this document to the below counsel if not registered:

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/s/ Melissa Foster Bird